

IN THE UNITED STATE DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

v.

CR. NO. 2:23-cr-20191-MSN-5

EMMITT MARTIN, III,
TADARRIUS BEAN, DEMETRIUS
HALEY, DESMOND MILLS, JR.,
AND JUSTIN SMITH

Defendants.

DEFENDANT, JUSTIN SMITH'S, NOTICE OF JOINDER TO DEFENDANT,
DEMETRIUS HALEY'S, SEALED MOTION TO EXCLUDE ANY
INTRODUCTION OF ALLEGED 404(b) EVIDENCE

COMES NOW the Defendant, Justin Smith (hereinafter "Smith") by and through his counsel of record, Martin Zummach, and files this his Notice of Joinder and would state as follows:

1. The Government has not provided an appropriate rationale under any of the prongs of 404(b) that would permit prior bad conduct to be admissible against Smith.
2. As such, Smith would state that the arguments and analysis contained in Defendant Haley's Sealed Motion to Exclude Any Introduction of Alleged 404(b) Evidence [ECF No. 130] filed on January 17, 2024, apply equally to him, and as such, adopts same as if copied verbatim herein.

Respectfully Submitted,

SPARKMAN-ZUMMACH, P.C.

S/Martin Zummach

Martin Zummach, #16352

Attorney for Defendant, Justin Smith

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CERTIFICATE OF SERVICE

The undersigned certifies that on the 24th day of January, 2024, a copy of the foregoing document was electronically filed with court clerk using the ECF System, and that upon filing, a copy will be sent via the Court's ECF System to all registered parties in this case.

S/Martin Zummach